



## Statement Regarding Modern Slavery Act in Canada 2024

### Pestell Pet Products Inc.

#### 1. Introduction

This report outlines the steps taken by Pestell Pet Products to prevent and reduce the risk of forced labor or child labor within its supply chain, in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (Canada's Modern Slavery Act) that was passed effective January 1<sup>st</sup>, 2024. Unless otherwise stated, this report outlines the actions taken by Pestell Pet Products during the fiscal year 2024 which is between the dates of May 1<sup>st</sup>, 2023, to April 30<sup>th</sup>, 2024.

#### 2. Our Commitment

Pestell Pet is committed to taking all steps to prevent forced labor and child labor within its supply chain.

We prohibit our people from engaging in, suggesting, allowing, or ignoring modern slavery, including forced labor, child labor, sexual exploitation or abuse, and human trafficking, in the conduct of our business. This commitment is implemented through Pestell Pet's Human Rights Policy and Code of Conduct. Pestell Pet Products will continue to adapt to maintain the highest standards of ethics and integrity in its business and relationships.

#### 3. Entity Overview

- a. **Company Structure:** Pestell Pet Products was founded in 1988 in Ontario, Canada. The Company operates under a well-defined organizational structure designed to optimize efficiency and productivity. At the top level, we have our executive leadership team, responsible for setting the strategic direction and guiding the overall operations of the company. There are various departments and functional units, each with its own set of responsibilities and objectives. Our organizational structure ensures clear communication channels, efficient decision-making processes, and accountability at all levels.
- b. **Company Activities:** We are actively engaged in the manufacturing industry. Our core activities include the manufacturing of cat litter and small animal bedding.
- c. **Supply Chain:** Our supply chain is a crucial component of our operations, encompassing all the activities involved in sourcing, procuring, producing, and delivering our products/services to customers. We work closely with a network of suppliers, vendors, manufacturers, distributors, and logistics partners to ensure the smooth flow of materials, components, and finished goods throughout the supply chain. Our supply chain management practices prioritize efficiency, quality,



sustainability, and ethical sourcing. We continuously evaluate and optimize our supply chain processes to minimize risks, reduce costs, and enhance overall performance.

#### 4. Training and Policies

- a. **Training Provided to Employees and Policies:** Pestell Pet Products provides training to its employees on recognizing and addressing issues related to forced labor and child labor.

Pestel Pet established policies and procedures that outline the expectations of its employees and external business partners and suppliers. Ethical Trading Policy explicitly prohibits all forms of modern slavery, including forced labor and child labor.

Our policies apply to all employees, directors, and others in an employment-type relationship with Pestell Pet products and highlight everyone's responsibility to respect and promote human rights and equality.

- b. **Supplier Code of Conduct:** Our Supplier Code of Conduct outlines Pestell Pet's expectation that its suppliers safeguard human rights in all their dealings, not engage in any form of modern slavery, and comply with all applicable laws and regulations. The Supplier Code of Conduct also states our expectations that suppliers must promptly disclose any suspected violation of these principles to Pestell Pet.

#### 5. Due Diligence Processes

Pestell Pet maintains due diligence processes and other procedures to identify and exclude modern slavery from its business and supply chain. The task of establishing and reviewing the effectiveness of those procedures has been led by the Human Resources Department, with support from the Supply Chain Department and the Vice President & General Manager of the organization.

These due diligence processes include sharing our Supplier Code of Conduct with our new suppliers and requesting them to assess and analyze their own workforce and supply chain by filling out a formal questionnaire designed by Pestell Pet Products.

#### 6. Risk Assessment and Management

Pestell Pet manages modern slavery risk through a variety of policies, processes, and practices, which are outlined in this statement.

We identify, assess, and monitor areas in our supply chain where there may be a risk of slavery and human trafficking.

## **7. Effectiveness Assessment**

We believe that good governance is the essential foundation of a respectful and inclusive corporate culture that earns trust from and builds value for our clients, employees, communities, and shareholders.

We continuously assess our internal policy, procedure, and processes and are committed to improving our approach to human rights and the effectiveness of our actions against forced and child labor in our supply chain.

## **8. Grievance Mechanisms**

Pestell Pet encourages its employees and members of its supply chain to report any actual or suspected breaches of ethical conduct, including modern slavery or other violations of human rights, in a timely manner.

Pestell Pet employees can report suspected misconduct to their supervisor or manager and Human Resources. For employees who would prefer to remain anonymous, grievance channels, such as a suggestion box in the plant, and a Human Resources mailbox in the office are available.

## **9. Remediation Measures**

Having leveraged supplier screenings and monitoring procedures, as well as our policies and processes relating to internal conduct, no evidence of modern slavery – including forced labor or child labor – or human trafficking incidents, or loss of income as a result of steps taken to eliminate modern slavery or human trafficking have been identified in 2024 and thus there has not been a basis to take remedial steps regarding such matters.

## 10. Approval

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities subject to the Canadian Act. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

### Signed by

*Christine Hoffman*

**Christine Hoffman**  
Vice President & General Manager  
Pestell Pet Products  
May 21<sup>st</sup>, 2024